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2/14/96

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
POLREP

Date: March 14, 1996
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Subject: Valentine Clark Corporation site, St. Paul, Ramsey County, Minnesota.
Polrep No: Polrep 1
Site ID: WG
D.O. No: 5001 - 05 - 386
Response Auth.: CERCLA/Time Critical Removal
NPL Status: NON-NPL
Start Date: 03/04/96

CURRENT SITUATION: The VCC site is located at 2575 and 2576 Doswell Avenue, St. Paul, Ramsey County, Minnesota. The site is located in an industrial area, situated on approximately 10-acres, at the western edge of the City of St. Paul and Ramsey County (latitude 44° 58' 51.0", longitude 93° 12' 23.0". Bridal Veil Creek flows from north to south along the western edge of the site, roughly the boundary that separates the cities of Minneapolis and St. Paul. The property existing approximately 200 feet west of Bridal Veil Creek is owned by Capp Industries. The site is bounded on the south by the Burlington Northern Railway, on the north by property owned by Portec Company-Pioneer Division, and on the east by the Minnesota Transfer Railway, which is located west of and parallel to State Highway 280. The nearest residence is located 1/4 mile east of the site beyond Highway 280. A chain link fence currently surrounds the west and south site boundaries.

VCC conducted operations at the site from approximately 1910 to 1962. The property was sold in 1967. Asphalt pavement and industrial buildings currently occupy 1/2 of the site, which is presently owned by Quality Metals to the north and Lapham-Hickey Steel to the south. The Quality Metals property consists of large scrap metal piles, metal drum piles, and an 85,000 square- foot storage and process building. The remainder of the parcel is open land with level topography and grassy vegetation. The Lapham-Hickey property consists of several office and warehouse buildings, a parking lot area, and scattered equipment and machinery. Areas

of scattered debris and household wastes are also present near the east side of Bridal Veil Creek. Sanborn Insurance maps, dating back as early as 1927, illustrate and identify the locations of many structures from the wood treating operations that no longer exist at the site, such as buildings, creosote storage tanks, various treatment and dip tanks, and pole storage areas. Most of these structures were located on the present Lapham-Hickey Steel property.

Bridal Veil Creek acts as a surface runoff point for most of the site and surrounding area. The creek passes through a culvert in the northern portion of the site and remains as an open ditch through the VCC site area until it again flows into a culvert south of the site and passes under the Burlington Northern Railway. The creek becomes an open ditch again before flowing into a small pond known as Bridal Veil Pond or Duck Pond. From this point the creek flows into the Mississippi River approximately 1 3/4 miles downstream.

In October 1991, Barr Engineering, under contract to MPCA, conducted a "Limited Soils Investigation" primarily in the area west of Bridal Veil Creek, proposed by the city and state as a possible relocation route of the existing contaminated section of the creek. The proposed action involves construction and placement of a concrete storm sewer between two existing city drain points west of Bridal Veil Creek. The storm sewer will allow the flow of the creek to bypass the contaminated open ditch section of the creek. An extent of contamination (EOC) study was conducted in order to determine whether a clean corridor would be available along which the proposed storm sewer could be constructed. Samples were collected from 17 soil borings. Analytical results from the Barr Engineering EOC study suggest that although soil contamination still exists in the area west of the creek, it is primarily limited to the alleged dumping area and from creek sediment boring samples. High concentrations detected on the west side of the creek were from samples collected at this alleged wetland dumping area (southwest corner). The Minneapolis Department of Public Works (MDPW) and MPCA agree that moving the proposed alignment further west of the Barr Engineering study area, the area now covered by Capp Industries parking lot, may provide a cleaner corridor for sewer construction and installation. This corridor would ultimately require excavation of soil that is less contaminated, resulting in lesser volumes of soil to be properly disposed as hazardous waste at a later date. Highly contaminated soils both east and west of the creek will be managed as part of a later non-time critical removal action. The MDPW has prepared engineering designs for the project along with cost estimates for the completion of the re-routing.

On November 9, 1993, the Director of the Waste Management Division approved an Action Memorandum for a U.S. EPA time critical removal action to reroute the contaminated section of Bridal Veil Creek.

On 2/22/96, U.S. EPA issued a Delivery Order 5001-05-386 to Riedel Environmental Services (RES) for $25,000 to perform removal activities at the site in support of the installation of the storm sewer.

On 2/28/96, the MPCA prepared a draft workplan for the Geotechnical/ Environmental Investigation (GEI) for the site in preparation for the storm sewer installation. The workplan objectives were to: 1) define the nature and extent of soil contamination along the proposed storm sewer corridor to determine contaminated soil volumes and associated disposal volumes, 2) determine the extent of unsuitable soils which may have to be removed for geophysical load bearing purposes, and 3) evaluate the effectiveness of soil screening methods during the storm sewer excavation work. The workplan scope called for the drilling of 10 borings along the proposed 960 linear feet storm sewer corridor. Soil samples were to be collected continuously at each boring with a split barrel sampler. Samples were to be screened for volatile organic compounds (VOCs) in the field using the jar headspace method and an organic vapor analyzer (OVA) and for the presence of oils by using the oil sheen test. The same samples would also be analyzed using Ohmicron Rapid Assay test kits for PAHs, carcinogenic PAHs, and PCPs. Selected samples were to be sent to a commercial laboratory for PAH and PCP analyses.

REMOVAL ACTIVITIES TO DATE: The following removal activities were undertaken for the period of 3/4/96 through 3/8/96:

RES, TAT, and OSC Gebien mobilized to the site on 3/4/96. Workers from the City were present on site with a 4.25 inch hollow stem drill rig. During the week, six borings were drilled in the south end of the site on Capp Industries property along the proposed path of the storm sewer. The topography, trees, and winter conditions prevented access to the North half of the proposed corridor with the drill rig. Drilling was concluded. Drill cuttings were collected and placed into three 55-gallon drums. The drums were labeled and placed on the ground on the east side of the fence near the Northeast corner of the Capp Industries truck dock area. A total of 17 soil samples were transported to Chicago for Rapid Assay analyses. Six selected soil samples will be sent to Ameritest and Research Laboratories, Bedford Heights, Ohio for semivolatile organics analyses via method 8270.

NEXT STEPS:

- Await analytical results for the soil boring samples.
- Establish the contaminant level criteria for soils in the sewer corridor, which will require off-site disposal at an approved facility.
- Based on the GEI information, RES will prepare a cost estimate for disposal of contaminated soils that are expected to be encountered during excavation of the storm sewer corridor.

- RES will arrange for disposal contaminated soils.
- Obtain an ERCS delivery order ceiling increase to accommodate the cost of disposal for contaminated soils.
- Mobilize ERCS and TAT to the site at the start of the City's sewer installation activities.

COST INFORMATION:

	TO DATE		CEILING
ERCS (Smith)	$3,005	(as of 3/7/96)*	$ 25,000
TAT	$ 800	(as of 3/7/96)**	$ 25,000

* from 1900-55 and includes awaits costs.
**estimated by OSC.